

May 11, 2018

ELECTRONICALLY FILED VIA REGULATIONS.GOV

Mark Hartman
Office of Pollution Prevention & Toxics
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, D.C. 20460-0001

Re: Comments of the Chemical Users' Coalition on EPA's TSCA Section 26(b) Proposed User Fees for the Administration of the Toxic Substances Control Act; EPA-HQ-OPPT-2016-0401; 83 Fed. Reg. 8,212 (Feb. 26, 2018)

Dear Mr. Hartman:

The Chemical Users Coalition ("CUC") appreciates the opportunity to provide the enclosed comments on the Agency's proposed user fees for the administration of the Toxic Substances Control Act ("TSCA").¹

The CUC is an association of companies from diverse industries that are interested in chemical management policy from the perspective of those who use, rather than manufacture, chemical substances.² The CUC appreciates the need to protect human health and the environment while fostering the pursuit of technological innovation, two goals that can and must be made compatible if our society is to achieve sustainable economic development. Aligning these goals is particularly important in the area of chemical management policy, since chemistry underlies all aspects of manufacturing, and all products are made from chemicals. Our comments are offered to support EPA's decision to focus its fee collection efforts on manufacturers and importers of chemical substances, and to suggest a few clarifications to the proposed rule to ensure fair and efficient collection of fees for the administration of TSCA.

¹ User Fees for the Administration of the Toxic Substances Control Act, 83 Fed. Reg. 8,212 (Feb. 26, 2018).

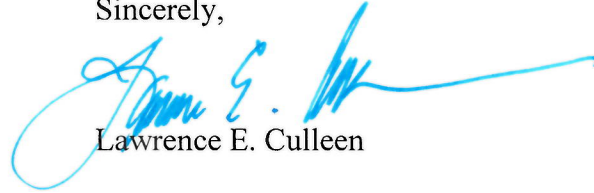
² The members of CUC are Airbus S.A.S., The Boeing Company, General Electric Company, HP Incorporated, IBM Company, Intel Corporation, Lockheed Martin Corporation, and United Technologies Corporation.

Arnold & Porter

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The CUC appreciates your consideration of these comments. If you have any questions relating to these comments, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lawrence E. Culleen", with a long horizontal flourish extending to the right.

Lawrence E. Culleen

Enclosure